

Exhibit A



August 9, 2024

[By Email - ctrimmer@shumaker.com; along@shumaker.com]

Ms. Christina D. Trimmer, Esq.
S. Alex Long, Jr., Esq.
Shumaker, Loop, and Kendrick
101 South Tryon Street
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Re: *Hayward v. Ningbo C.F.*, Case No. 3:20-CV-710

Womble Bond Dickinson (US) LLP

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Dear Christy and Alex,

As you know, the Court entered a Temporary Restraining Order in the above-captioned case on April 11, 2024, which has, since then, been extended without interruption. The TRO enjoins “Defendants and their agents, employees, and representatives” from “facilitating or allowing any withdrawal, transfer, or disposition of assets presently held in any bank accounts owned or controlled by Defendants.” (Doc. No. 393 at 7).

We understand that Blueworks Corporation filed bankruptcy and thus an automatic stay applies to that Defendant. Can you please confirm that the other three Defendants you represent are complying with the terms of the TRO?

We are concerned because Ningbo C.F. Electronic Tech. Co. appears to be operating a robust business. It seems implausible Ningbo C.F. could do so without “facilitating or allowing any withdrawal, transfer, or disposition of assets presently held in any bank accounts owned or controlled by Defendants.” (Doc. No. 393 at 7). While we are willing to engage in discussions to permit such transfers to allow Ningbo to stay in business—after all, that is in Hayward’s best interest, too, so it can collect on its judgment—we seek confirmation that Ningbo is not violating the TRO.

For example, Ningbo C.F. claims to have 200 employees. How is Ningbo C.F. paying those employees? Presumably, Ningbo C.F. would have to pay vendors and for parts and other supplies, as well. How is Ningbo C.F. paying those bills?

Please confirm with your client that the TRO is not being violated. Thank you for your attention to this important matter.

Sincerely,

Womble Bond Dickinson (US) LLP

Russ Ferguson